

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA
VIDAL, *et al.*,

Plaintiffs,

v.

KIRSTJEN M. NIELSEN, *et al.*,

Defendants.

No. 16-cv-4756 (NGG) (JO)

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

DONALD TRUMP, *et al.*,

Defendants.

No. 17-cv-5228 (NGG) (JO)

NOTICE OF FILING OF REVISED PRIVILEGE LOG

On September 4, 2020, Defendants in the above-captioned matters filed the Administrative Record for the memorandum issued by Acting Secretary Chad F. Wolf on July 28, 2020, entitled “Reconsideration of the June 15, 2012 Memorandum Entitled ‘Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children,’” along with a privilege log for the privileged documents that were directly or indirectly considered by Acting Secretary Wolf in connection with his July 28, 2020 decision. *See Batalla Vidal* ECF No. 319.

After the parties conferred regarding the privilege log, Defendants agreed to provide a revised privilege log in order to narrow the grounds of potential dispute. *See Batalla Vidal* ECF

No. 325. In the attached revised privilege log, Defendants have identified each author or recipient that was acting in their capacity as an attorney, added agency affiliations that were missing, elaborated on the privilege descriptions where appropriate, and specified the time of July 28 entries in relation to the signature of the memorandum. *See* Exhibit 1.

Dated: September 25, 2020

Respectfully submitted,

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